

104(e) Letter Response Summary
Work Assignment ES002
Lower Darby Creek Area Site



The Boeing Company

Prepared for:

U.S. Environmental Protection Agency
Region III
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

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Work Assignment Number:	ES002
Date Submitted:	August 21, 2001
Contract Number:	68-S3-01-01
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104(e) Letter Response Summary

Company Name	The Boeing Company
Response Date	July 2, 2001
Receipt Date	July 5, 2001
Company Ownership	The Boeing Company (Respondent) is the parent company and current owner (as of the end of FY 2000) of 233 subsidiaries (as listed in Attachment 1, Boeing's 10-K for FY 2000)
Hazardous Wastes Identified	<ul style="list-style-type: none"> None; however, Attachment 2 included a list of materials released to hauling/disposal contractors, including waste treatment plant sludge released to Eastern Industrial Corporation during 1976-1977. A list of waste released to other companies included septic, waste water with paint solids and oils, waste oil, acid-alkalines with and without solvents and cyanides, although these may not be related to the Site area.
Transporters Used	<ul style="list-style-type: none"> Eastern Industrial - Respondent identified 2 purchase orders for Eastern Industrial involving "removal of trash and waste." (See Attachment 2). One of the purchase orders indicates that sewage treatment plant sludge was transported to Knickerbacker Landfill in Malvern, PA.
Additional PRPs Identified	<ul style="list-style-type: none"> None; however, Respondent identified Vertol Aircraft Corporation, which it purchased in 1960, as prior owner of the current Philadelphia Boeing operations.
Unanswered Questions	<ul style="list-style-type: none"> None

Incomplete or Insubstantial Answers	<ul style="list-style-type: none">• (3) Unable to locate relevant information• (4c) Unable to locate relevant information• (5) General objection to over-broad/burdensome nature of inquiry• (6) General objection to over-broad/burdensome nature of inquiry• (7) General objection to over-broad/burdensome nature of inquiry• (8b, c, d, e, f, g, h, i) Unable to locate relevant information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders• (9) No evidence that required information exists• (10) No evidence that required information exists• (11) No evidence that required information exists• (12) Unable to locate relevant information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders• (13) No evidence that required information exists• (14) No evidence that required information exists• (16) Unable to locate relevant information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders, which are believed to have been destroyed. Archived microfilm is unidentifiable.• (16d) No specific information provided
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Attachments	<ul style="list-style-type: none">• Attachment 1, Form 10-K, for Fiscal Year 2000• Attachment 2, July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol• Attachment 3, Master Records Retention Schedules D-200-10050-2 Revision

Comments	Respondent included very little useful information in the 104(e) letter response, citing general objections to the "over-broad, unreasonable, and unduly burdensome nature of the questions." A potential issue is that Boeing has microfilm records of all purchase orders and financial records, but they are described as generally unidentifiable based on "time period, purchase order or other relevant identifying information (see response to Question 16).
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